

# **External Meeting Request Form for Administrator E. Scott Pruitt**

## **U.S. Environmental Protection Agency**

*To request the Administrator to attend and/or speak at your event, please complete and submit the following form.*

**Today's Date:** April 18, 2017

**Meeting Date:** April 28, 2017

**Meeting Time:** 1:45

**Requested Location (if offsite, please list address, parking instructions, etc.):**  
**Office of Administrator**

**Requestor:** Joe Bischoff on behalf of National Sorghum Producers (NSP)

**Purpose of the Meeting:** Sorghum Oil Pathway approval – Sorghum industry pesticide issues (chlorpyrifos, sulfoxaflor and atrazine)

**Background on the Meeting:** Short background: First, NSP has been working with EPA since 2013 to gain approval for a sorghum oil biodiesel pathway. The Agency has the legal authority to approve this pathway but continues to request information immaterial to approval. Second, sorghum farmers have witnessed significant pesticide-related restrictions and the threat of revocation of more than half of the crop's reliable insecticides. NSP recognizes the significant challenges the coming registration reviews of important chemistries will bring.

Long Background: NSP has been working with EPA since 2013 to gain approval for a sorghum oil pathway. For several years EPA staff maintained NSP would not be required to submit a full petition. EPA then reversed course and asked for a full petition. NSP submitted a full petition in July of 2016 after having invested significant time and funding into research to gather the data EPA requested. This petition can be approved by letter without any formal rulemaking process. In fact, EPA has multiple legal precedents in the last two years.

Despite this precedent, EPA asked for additional information in October of 2016, and NSP submitted this information in January of 2017. EPA again asked for additional information in March of 2017, and NSP submitted this information in April of 2017. This most recent submission will have no bearing on EPA's approval of this petition as the information will have a negligible impact on greenhouse gas (GHG) emissions. Per the RFS2 final rule, a fuel is considered advanced if its GHG emissions achieve a 50 percent reduction from the established baseline. Sorghum oil biodiesel is almost identical to corn oil biodiesel, and corn oil biodiesel meets this GHG reduction threshold easily having been approved in March 2010.

Every month that drags by costs sorghum farmers and ethanol plants hundreds of thousands of dollars. This has nothing to do with the philosophical debate over the RFS. This has everything to do with EPA applying the rules of the RFS in a fair and timely manner that does not discriminate against sorghum farmers and its end users.

NSP also hopes to provide a brief overview of other issues under the EPA purview that dramatically impact sorghum farmers. In recent years sorghum farmers have witnessed further restrictions and the threat of revocation of more than half of the crop's reliable insecticides. NSP greatly appreciates the steps taken by EPA under the Trump administration to deny the petition to revoke the tolerances for chlorpyrifos. NSP also recognizes the significant challenges the coming registration reviews of organophosphates, pyrethroids, neonicotinoids and other important chemistries will bring. These periodic reviews do not relate to product safety but rather to fundamental and precautionary changes made to the registration process, and the Agency's timely execution of them is essential to business certainty for sorghum farmers.

**Role of the Administrator:**

**Attendees: JB Stewart, NSP Past Chairman, Keyes, OK; Tom Willis, NSP Board Member and CEO of Conestoga Energy, Liberal, KS; Tim Lust, NSP CEO, Lubbock, TX; and Joe Bischoff, Cornerstone Government Affairs**

**Point of Contact: Joe Bischoff**